


Mr. Bill Fonferek
September 11, 2000
Page Two

Based on the information contained in the draft feasibility report and draft environmental assessment and the enclosed comments provided by our reviewing agencies, the state has determined that, at this stage, the above-referenced project is consistent with the Florida Coastal Management Program (FCMP). All subsequent environmental documents prepared for this project must be reviewed to determine the project's continued consistency with the FCMP. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews.

In addition, comments expressing several concerns were received from the Tampa Bay Regional Planning Council (TBRPC) and Hillsborough County. The comments received from the TBRPC and Hillsborough County are enclosed for your review and consideration.

Thank you for the opportunity to review the above-referenced documents. If you have any questions regarding this letter, please contact Ms. Cherie Trainor, Clearinghouse Coordinator, at (850) 414-5495.

Sincerely,



Ralph Cantral, Executive Director
Florida Coastal Management Program

RC/cc

Enclosures

cc: Bradley Hartman, Florida Fish and Wildlife Conservation Commission
Lynn Griffin, Department of Environmental Protection
Angela Hurley, Tampa Bay Regional Planning Council
Shawn College, Hillsborough County

ECOSYSTEM MGMT.

Fax:850-922-5380

Aug 25 '00 11:15

P.02/04

Jeb Bush
GovernorMarjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000David B. Struhs
Secretary

August 23, 2000

Ms. Cherie Trainor
State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100RE: USCOE/Draft Feasibility Report and Draft Environmental Assessment
Navigation Study for Tampa Harbor-Alafia River, Hillsborough County
SAI: FL98-0037CR

Dear Ms. Trainor:

The Department of Environmental Protection has reviewed the referenced draft Feasibility Report and draft Environmental Assessment (EA) of a project that would deepen the Alafia River Channel in Tampa Harbor and expand the turning basin at the Cargill Fertilizer site.

In addition to its review of the captioned project, the Department is also processing an environmental resource permit (ERP) for certain other improvements at the Cargill facility. The EA under review evaluates the next phase of navigation improvements at the site, which are not covered by the ERP currently being processed. A separate ERP will be required for the project described in the EA, and the proposed beneficial use of dredged material will be evaluated as part of the permit review process. Sediment quality and elutriate analyses will be required to determine the suitability for disposal to create shallow water or intertidal habitat.

The Department has the following questions and concerns about the preferred alternative for the project and the information presented in the Environmental Assessment:

1. The Summary of Environmental Effects in the Feasibility Report and Section 4.3.2 of the EA state that 0.275 acres of mangrove will be impacted by the project. There is no mention of impacts that will occur to other wetlands, which include restored and naturally occurring tidal marsh, restored depressional fresh water wetlands, and possibly the restored river channel, all of which are located on the South Parcel. During the site inspection of August 3, the Department confirmed that the project will impact significantly more than 0.275 acres of fringe mangrove. All wetland losses should be quantified and evaluated in the EA; acreage should be based on a determination of the state's regulatory jurisdiction.

"More Protection, Less Process"

Printed on recycled paper.

Ms. Cherie Trainor
August 23, 2000
Page Two

2. Although mitigation can only be formally reviewed and approved through the environmental resource permit process after wetland impacts have been sufficiently avoided and minimized, it is clear that the EA significantly underestimates wetland impacts (0.275 acres) and, therefore, the amount of mitigation that will be required. The EA should describe an acceptable mitigation proposal based on the total wetland acreage and type. Department staff are available to provide preliminary guidance on acceptable mitigation strategies for impacts to wetlands and other lands subject to a South Parcel conservation easement.

3. The restoration project on the South Parcel is listed in 3.3.2m of the Draft Environmental Assessment as a "Relevant (Biological) Factor of the Environment" that would be affected by the dredging activity. The Draft EA does not, however, include a plan to mitigate impacts to the restoration project. There is a signed agreement to protect a portion of the affected property under a conservation easement. Any impacts to property covered by the easement must be determined to be "in the public interest" and will have to be compensated through mitigation and other measures that result in a net environmental benefit.

4. Section 4.3.1b of the Draft EA (Environmental Consequences of Expansion of Existing Channel and Turning Basin) states that completion of the preferred alternative would result in a loss of 34 acres of benthic habitat. Table 1 states that there would be a loss of 19 acres of benthic habitat under the preferred alternative. The discrepancy needs to be reconciled.

5. Section 4.7.2b references the long-term creation of a 272-acre site to provide substantial nesting and foraging area for birds upon completion of the preferred alternative. Table 1 states that there will be an increase of 67 acres of bird nesting and foraging area. The discrepancy needs to be addressed so that Section 4.7.2b and Table 1 are consistent.

6. Text has been omitted at the page break in Section 3.3.3 (Social and Cultural Resources) on pages 24 - 25 of the Draft EA, precluding a meaningful review of the section.

7. The assessment does not contain Appendix I (Endangered Species Consultation).

At this time, the Corps of Engineers does not support the dredging project and recommends that it not be pursued. The basis for the decision is that the proposed improvements would serve a single user (Cargill), which is inconsistent with current Corps policy. The environmental conclusion of the EA is that the preferred alternative would have no significant impact. That conclusion is not supported by the findings in the environmental assessment, primarily because the description of the affected environment is incomplete and the proposed mitigation is inadequate.

ECDSYSTEM MGMT.

Fax:850-922-5380

Aug 25 '00 11:16

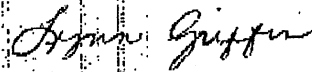
P.04/04

Ms. Cherie Trainor
August 23, 2000
Page Three

The environmental assessment should be revised or supplemented to address identified issues and information gaps by (a) expanding the description and acreage of resources that would be affected by the project; (b) thoroughly documenting all appropriate means to avoid and minimize those impacts; and (c) including a comprehensive mitigation plan to fully compensate for unavoidable losses in accordance with the requirements of Section 373.414, F.S., and the conservation easement on the South Parcel. The Department will determine the consistency of the project upon reviewing the supplemental information submitted.

We appreciate the opportunity to review the draft EA for the Tampa Harbor/Alafia River Channel dredging project. Consultation with the Department's Southwest District Office in Tampa concerning jurisdictional boundaries, mitigation options and permit requirements is recommended. Please feel free to call me at 487-2231 if you have any questions concerning our comments.

Sincerely,



Lynn Griffin
Environmental Administrator
Office of Intergovernmental Programs

/seg

cc: Deborah Getzoff, SW District

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION



JAMES L. "JAMIE" ADAMS, JR.
Bushnell

BARBARA C. BARSH
Jacksonville

QUINTON L. HEDGEPEETH, DDS
Miami

H.A. "HERKY" HUFFMAN
Deltona

DAVID K. MEEHAN
St. Petersburg

JULIE K. MORRIS
Sarasota

TONY MOSS
Miami

EDWIN P. ROBERTS, DC
Pensacola

JOHN D. ROOD
Jacksonville

ALLAN L. EGBERT, Ph.D., Executive Director
VICTOR J. HELLER, Assistant Executive Director

OFFICE OF ENVIRONMENTAL SERVICES
BRADLEY J. HARTMAN, DIRECTOR
(850)488-6661 TDD (850)488-9542
FAX (850)922-5679

July 20, 2000

Ms. Cherie Trainor
Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

RE: SAI 199802020037CR, Hillsborough
County, Alafia River Navigation
Study, U.S. Army Corps of
Engineers

Dear Ms. Trainor:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission has reviewed the referenced project, and provided the attached comments, dated July 10, 2000, to the Florida Department of Environmental Protection.

Sincerely,

A handwritten signature in cursive script, reading "Bradley J. Hartman".

Bradley J. Hartman
Office of Environmental Services

BH/ps
ENV 1-3-2
J:\oes\paula\saicoverletter
Enclosure

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION**JAMES L. "JAMIE" ADAMS, JR.**
Bushnell**BARBARA C. BARSH**
Jacksonville**QUINTON L. HEDGEPEETH, DDS**
Miami**H.A. "HERKY" HUFFMAN**
Deltona**DAVID K. MEEHAN**
St. Petersburg**JULIE K. MORRIS**
Sarasota**TONY MOSS**
Miami**EDWIN P. ROBERTS, DC**
Pensacola**JOHN D. ROOD**
Jacksonville**ALLAN L. EGBERT, Ph.D., Executive Director**
VICTOR J. HELLER, Assistant Executive Director

July 10, 2000

OFFICE OF ENVIRONMENTAL SERVICES
BRADLEY J. HARTMAN, DIRECTOR
(850)488-6661 TDD (850)488-9542
FAX (850)922-5679

Mr. Mark Peterson
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: File No. 29-01562913-001, Cargill
Berth Expansion, Hillsborough
County

Dear Mr. Peterson:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission (FWC) has reviewed the referenced permit application and offers the following comments. Our comments will also be submitted to the U.S. Army Corps of Engineers, in compliance with the Fish and Wildlife Coordination Act.

The initial proposed project (Phase I) consists of the expansion of an existing phosphate loading dock, construction of an unloading dock for sulfur pellets, dredging of the unloading dock area, dredging of the Alafia River turning basin, and dredging of the existing north berth. If federal funds become available, the Hillsborough Bay and Alafia River Channels may be dredged to a depth of -41 feet mean low water (MLW) with an over-dredge of plus 2 feet. If this channel dredging occurs, then Cargill will propose Phase II, which includes upgrading the existing docking facility and turning basin to accommodate larger vessels.

The Cargill Fertilizer Inc. Berthing Facility is located on the north side of the Alafia Turning Basin near the mouth of the Alafia River, on Hillsborough Bay. The initial project impacts include 5.1 acres of submerged bottoms, 0.28 acres of littoral shallows, 0.43 acres of ditch wetlands, and 4.89 acres of uplands. The Phase II portion of the project will impact 9.59 acres of submerged bottoms, 1.07 acres of littoral shallows, 2.07 acres of ditch wetlands, and 2.41 acres of uplands.

As mitigation for Phase I impacts, Cargill is proposing a 2:1 ratio for wetlands impacts and a 1:1 ratio for impacts to littoral shallows, for a total of 1.14 acres of mitigation. This mitigation would include exotic plant removal, grading to wetland elevations, and planting of native wetland vegetation at a site east of U.S. 41, south of Delaney Creek. Mitigation for Phase II impacts involves 5.21 acres of wetland enhancement/creation at the same mitigation site. No mitigation is proposed for impacts to submerged bottoms or impacts to uplands. Spoil from the proposed dredging activity would be placed at an existing Storage Site C.

Mr. Mark Peterson
July 10, 2000
Page 2

Manatee use of this area is documented by aerial survey, mortality, and satellite telemetry data. The discharge at the Gardiner Phosphate plant located in the Alafia River received heavy use by manatees in the 1980s, but reduced discharge may have lowered the number of animals that visit the river. Even with this decrease in discharge, there appears to be substantial use of the river by manatees. Between January 1974 and February 2000, 40 manatees have died within a 5-mile radius of the project location. Over half of these deaths (54%) have occurred within the past five years, with 85% occurring in the 1990s. Thirty-three percent of these deaths were watercraft-related. The river may also be a preferred calving area, due to the high incidence of perinatal manatee deaths. Six dependent calves have died in the river between January 1974 and February 2000, half of which have occurred in the 1990s.

The applicant has agreed to use the standard manatee protection conditions during dredging. To satisfy the requirements of 373.414(1)(a)2, Florida Statutes, the additional conditions listed in Attachment A to this letter should be made a part of this permit.

Listed sea turtles, including the loggerhead (threatened) and Atlantic ridley (endangered), are known in the project area. The applicant states that hydraulic dredging will minimize the potential for sea turtle impacts.

Little blue heron (species of special concern - SSC), roseate spoonbill (SSC), yellow-crowned night-herons, and great blue herons forage in the wetland shoreline that will be impacted by Phase I.

Depending upon water level conditions, foraging wading birds, and migratory shorebirds, waterfowl, and raptors visit and winter at Storage Site C. The National Audubon Society has monitored shorebird nesting activity at Storage Site C intermittently for the last 15+ years.

Storage Site C is a documented nesting area for black-necked stilts and gull-billed terns. Black-necked stilts nest in many, but not all, years. Probably the key factor is the amount of standing water present; stilts nest on bare flats or on low bars and feed in adjacent shallows. If water is too deep, flats are not exposed, and if the flats are completely dry, there is no food. The nesting season is May through July, with some late nesters possibly still caring for non-flying young into August. Numbers of stilts have varied from year to year, but in 1989 and 1997 there were an estimated 50 nesting pairs. Nesting birds are very vulnerable to flooding from summer rains.

Gull-billed terns occasionally nest among the stilts. This is a rare species locally and in Florida, with 1-3 pairs typically occurring at Site C in years when they are present. Their nesting season and preferred habitat are the same as for black-necked stilts.

The site has the potential to be used for nesting by common moorhens, black skimmers, American avocets, and mottled ducks. Common moorhens nest in an adjacent pond and mottled ducks nest nearby, and might use the site when flooded. A wide variety of migrant and wintering shorebirds (e.g., sandpipers and plovers) use Storage Site C when conditions are appropriate.

Mr. Mark Peterson
July 10, 2000
Page 3

Shallow water and partially exposed flats offer valuable foraging and roosting sites. Peak migration months are August-October (fall), and April-May (spring). Numbers can exceed 1,000 or more birds. When sufficiently flooded, the storage site is important for migrant and wintering ducks, particularly northern shovelers (up to 500 or more). Scarcer species include ruddy duck, lesser scaup, ring-necked duck, pintail, American wigeon, mottled duck, green-winged teal, and blue-winged teal.


We recommend that a bird protection management plan, including avoidance of impact to nests, be developed for Phase I of this project. The plan should be submitted for review and comment by the U.S. Fish and Wildlife Service, FWC, and Mr. Rich Paul of the National Audubon Society. The final approved plan should become part of the proposed permit. If Storage Site C will be eliminated as long-term useful habitat for these species, mitigation measures will need to be proposed.

West of the mouth of the Alafia River and south of the shipping channels are Bird Island and Sunken Island, also known as the Alafia Bank. These islands comprise one of the largest and most diverse bird rookeries in the United States, with a total of 18,000 pairs of 16 species of birds nesting in 1998. In order to protect this rookery, dredging equipment and operations need to be stored/anchored on the north side of the channel, away from the islands. This protocol should be included in the bird protection management plan for this project.

The cumulative effects of larger vessels on listed species occurring in the project area needs to be assessed, particularly for species subject to vessel impacts. Cumulative impacts should be factored into the functional assessment of project impacts prior to assessment of mitigation measures.

Phase II of the project should not be permitted at this time. A matter of potential concern is the stability of the Alafia Bank if the Hillsborough Bay and Alafia River Channels are deepened. We have observed losses of deltaic islands at passes and river mouths that previously served as bird nesting areas after dredging of deep channels and/or removal of submerged shoals. A study of the effects of Phase I and of the proposed channel deepening should be completed before consideration of Phase II proposals.

Sincerely,


Bradley J. Hartman, Director
Office of Environmental Services

BJH/JWB
cargillb
ENV 1-2-2
Enclosure

Mr. Mark Peterson
July 10, 2000
Page 4

cc: Mr. James Y. Zinner
URS Greiner Woodward Clyde
7750 West Courtney Campbell Causeway
Tampa, Florida 33607-1462

Mr. Ozzie Morris
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Tampa Port Authority
Office of Environmental Affairs
P.O. Box 2192
Tampa, Florida 33601

U.S. Fish and Wildlife Service
9549 Koger Boulevard, Suite 111
St. Petersburg, Florida 33702

Mr. Joe Bacheler
Chief, Tampa Regulatory Field Office
U.S. Army Corps of Engineers
P.O. Box 19247
Tampa, Florida 33686-9247

Ms. Nancy Douglass, Regional Nongame Biologist
Florida Fish and Wildlife Conservation Commission
Division of Wildlife, Bureau of Nongame Wildlife
3900 Drane Field Road
Lakeland, Florida 33811

Mr. Rich Paul
Refuge Manager
National Audubon Society
410 Ware Boulevard, Suite 500
Tampa, Florida 33619

**Attachment A-Recommended Additional Permit Conditions for the
Protection of the West Indian Manatee**

1. At least one person shall be designated as a manatee observer when in-water work is being performed. That person shall have experience in manatee observation, and be equipped with polarized sunglasses to aid in observation. The manatee observer must be on site during all in-water construction activities and will advise personnel to cease operation upon sighting a manatee within 50 feet of any in-water construction activity. Movement of a work barge, other associated vessels, or any in-water work shall be minimized to the extent possible after sunset, when the possibility of spotting manatees is negligible.
2. To reduce the risk of a vessel crushing a manatee during docking and/or mooring, fenders or buoys between a bulkhead/wharf and a vessel, or between two vessels rafted together, shall be installed, used, and maintained for the life of the facility. The fenders and/or buoys shall provide at least three feet of standoff space under maximum operational compression, and shall be installed above mean high water. A cantilevered bulkhead/wharf may be used as an alternative to fenders if constructed above mean high water and if sufficient standoff space is provided.
3. To reduce the risk of entrapment and drowning of manatees, grating shall be installed over culvert pipes greater than 18 inches, but smaller than six feet in diameter. Bars or grates no more than 8 inches apart shall be placed on the accessible end(s) to restrict manatee access. The installation of grates applies to any submerged or partially submerged pipes and culverts accessible to manatees during any tidal phase.
4. In order to provide protection to manatees during the operation of this facility, permanent manatee information and/or awareness sign(s) shall be installed and maintained to increase boater awareness of the presence of manatees, and of the need to minimize the threat of boats to these animals. The signs shall be installed prior to the facility opening and beginning operations, should be replaced in the event the signs fade or become damaged, and shall be maintained for the life of the facility. The number, type, and procedure for installation should be in accordance with "Permanent Manatee Signs", which can be obtained from the Bureau of Protected Species Management, 620 S. Meridian Street, Tallahassee, FL 32399-1600 (phone 850/922-4330).

COUNTY: Hillsborough

DATE: 05/15/2000

COMMENTS DUE DATE: 06/14/2000

CLEARANCE DUE DATE: 06/29/2000

Message:

SAI#: FL199802020037CR

STATE AGENCIES

WATER MANAGEMENT DISTRICTS

OPB POLICY UNITS

Community Affairs
Environmental Protection
Fish & Wildlife Conserv. Comm
X State
Transportation

Southwest Florida WMD

Environmental Policy/C & ED

Hillsborough
SAI-Corps-EA
2000-03598

Mag Army previously
reviewed 12/2/99 - complete
& sufficient - avoid ~~potentially~~
sig anomalies
Ref: 2000-03657 & 997624

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

— Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.

—X— Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.

— Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.

— Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

Project Description:

Department of the Army - District Corps of Engineers - Draft Feasibility Report and Draft Environmental Assessment - Navigation Study for Tampa Harbor - Alafia River - May 2000 - Hillsborough County, Florida. also on the Internet at:
<http://www.saj.usace.army.mil/pd/env-doc.htm>

To: Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
(850) 922-5438 (SC 292-5438)
(850) 414-0479 (FAX)

EO. 12372/NEPA

Federal Consistency

☒ No Comment
☐ Comments Attached
☐ Not Applicable

☒ No Comment/Consistent
☐ Consistent/Comments Attached
☐ Inconsistent/Comments Attached
☐ Not Applicable

From:

Division/Bureau: DHR / SHP

Reviewer: P. Yates

Date: 6-8-00

John B. [Signature] 6/12/2000



Florida Department of Transportation

605 Suwannee Street
Tallahassee, Florida 32399-0450

THOMAS F. BARRY, JR.
SECRETARY

JEB BUSH
GOVERNOR

June 6, 2000

Cherie Trainor
Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida, 32399-2100

JUN 9 2000

RECEIVED
JUN 9 2000

**Re: Draft Feasibility Report and Draft Environmental Assessment-Navigation Study
for Tampa Harbor-Alafia River, Hillsborough County.
SAI # FL199802020037CR**

Dear Ms. Trainor:

The Department has reviewed the subject application and has no comments.

Sincerely,

Larry B. Phillips
Intermodal Specialist/Seaport Office

cc: Donald J. Skelton, D-7
Harry Reed, D-7
Sandra Whitmire
File



An Equal
Opportunity
Employer

Southwest Florida Water Management District

Tampa Service Office
7601 Highway 301 North
Tampa, Florida 33637-6759
(813) 985-7481 or
1-800-836-0797 (FL only)
SUNCOM 578-2070

Bartow Service Office
170 Century Boulevard
Bartow, Florida 33830-7700
(863) 534-1448 or
1-800-492-7862 (FL only)
SUNCOM 572-6200

2379 Broad Street, Brooksville, Florida 34609-6899
(352) 796-7211 or 1-800-423-1476 (FL only)
SUNCOM 628-4150 TDD only 1-800-231-6103 (FL only)
World Wide Web: <http://www.swfwmd.state.fl.us>

Venice Service Office
115 Corporation Way
Venice, Florida 34292-3524
(941) 486-1212 or
1-800-320-3503 (FL only)
SUNCOM 526-6900

Lecanto Service Office
3600 West Sovereign Path
Suite 226
Lecanto, Florida 34461-8070
(352) 527-8131
SUNCOM 667-3271

June 1, 2000

Ronald C. Johnson
Chair, Lake Wales
Branda Menendez
Vice Chair, Tampa
Sally Thompson
Secretary, Tampa
Ronnie E. Duncan
Treasurer, Safety Harbor
Monroe "Al" Coogler
Lecanto
Joe L. Davis, Jr.
Wauchula
Rebecca M. Eger
Sarasota
John P. Harlee, IV
Bradenton
Watson L. Haynes, II
St. Petersburg
John K. Renke, III
New Port Richey
Pamela Stinnette-Taylor
Tampa

E. D. "Sonny" Vergara
Executive Director

Gene A. Heath
Assistant Executive Director

Edward B. Helvenston
General Counsel

Ms. Cherie Trainor
Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

**Subject: Department of the Army- District Corps of Engineers-
Navigation Study for Tampa Harbor- Hillsborough
County, Florida; SAI#: FL199802020037CR**

Dear Ms. Trainor:

The staff of the Southwest Florida Water Management District (District) has conducted a consistency evaluation for the referenced project. Consistency findings are divided into four categories and are based solely on the information provided in the subject application.

FINDING	CATEGORY
X	Consistent/No Comment
	Consistent/Comments Attached
	Inconsistent/Comments Attached
	Consistency Cannot be Determined Without an Environmental Assessment Report/Comments Attached

The District appreciates the opportunity to participate in the review of this application. Please be advised that our review does not constitute permit approval under Chapter 373, Florida Statutes, or any rules promulgated thereunder, nor does it stand in lieu of normal permitting procedures in accordance with Florida Statutes and District rules.

COUNTY: Hillsborough

Message:

DATE: 05/15/2000

COMMENTS DUE DATE: 06/14/2000

CLEARANCE DUE DATE: 06/29/2000

SAI#: FL1998020037CR

STATE AGENCIES

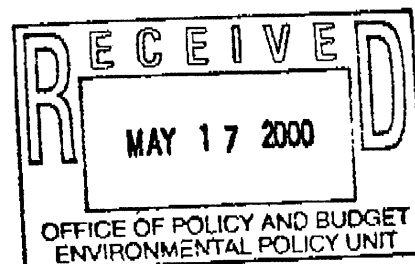
Community Affairs
Environmental Protection
Fish & Wildlife Conserv. Comm
State
Transportation

WATER MANAGEMENT DISTRICTS

Southwest Florida WMD

OPB POLICY UNITS

X Environmental Policy/C & ED



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EO. 12372/NEPA

Federal Consistency

- ☒ No Comment
☐ Comments Attached
☐ Not Applicable

- ☐ No Comment/Consistent
☐ Consistent/Comments Attached
☐ Inconsistent/Comments Attached
☐ Not Applicable

From:

Division/Bureau:

Reviewer:

Date:

DPB / Env. Policy Unit
Carla [Signature]
6-26-00

*Tampa Bay Regional Planning Council*

Chairman
Commissioner Chris Hart

Vice-Chairman
Frederick T. Reeves

Secretary/Treasurer
Mayor Pat Whitesel

Executive Director
Manny L. Pumariega

July 10, 2000

Ms. Cherie L. Trainor, Coordinator
Florida State Clearinghouse
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Subject: IC&R #163-00, Environmental Assessment for Tampa Harbor/Alafia
River Channel Expansion, SAI #FL199802020037C, Hillsborough
County

Dear Ms. Trainor:

The aforementioned project was reviewed for consistency with the Tampa Bay Regional Planning Council's *Strategic Regional Policy Plan*. The attached report was approved by the Council at its July 10, 2000 meeting and summarizes the Council staff's findings.

Please contact me if further information regarding this item is desired.

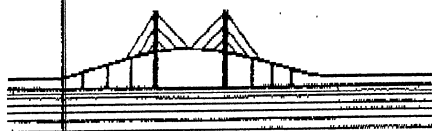
Sincerely,

Angela Hurley, Research Planner
Intergovernmental Coordination & Review

AH/bj

Enclosure

cc: Mr. Bill Fonferek, U. S. Army Corps of Engineers



Tampa Bay Regional Planning Council

IC&R

Intergovernmental Coordination and Review

9455 Koger Blvd., Suite 219, St. Petersburg, FL 33702
Phone (727) 570-5151 Suncom 513-5066 FAX (727) 570-5118
<http://www.tbrpc.org>

TAMPA HARBOR-ALAFIA RIVER FEASIBILITY STUDY AND DRAFT ENVIRONMENTAL ASSESSMENT, SAI #FL1998020037CR, HILLSBOROUGH COUNTY, IC&R #163-00.

The Florida State Clearinghouse has requested review and comment on the Feasibility Study and Draft Environmental Assessment for the Tampa Harbor - Alafia River project. The proposed project includes enlarging and deepening the turning basin and navigational channel which serves the Cargill facility at the mouth of the Alafia River in central Hillsborough County.

As studied, the proposed project encompasses:

- enlarging the turning basin from 700 X 1200 feet to 1200 feet in diameter;
- deepening the turning basin from 32 feet to 42 feet;
- widening the 3.6-mile access channel from 200 feet to 250 feet; and
- deepening the access channel from 32 feet to 42 feet.

An estimated 5.5 million cubic yards of sandy and rocky material would be removed. Proposed disposal sites include marsh and upland creation adjacent to Disposal Site 2-D and adjacent to Bird Island, shoreline protection for Bird Island; placement in existing disposal sites within Hillsborough Bay and the uplands; and placement at the Offshore Dredged Material Disposal Site.

The proposal would result in the loss of about 0.3 acres of mangroves and an unspecified amount of shallow water and shoreline habitat. Standard State and Federal manatee protection measures and federal Migratory Bird Protection Policy will be implemented during construction to eliminate impacts to manatees and nesting birds.

The project would allow Cargill Fertilizer, Inc. to bring in "PanaMax" vessels, the largest ships that can traverse the Panama Canal, to ship phosphate products to the Far East. Also, until the channel and turning basin are deepened, ships currently serving the facility cannot be loaded to full capacity at the dock. The improvements will result in more economical transport and help keep the company competitive with other manufacturers.

Council Comments/Concerns

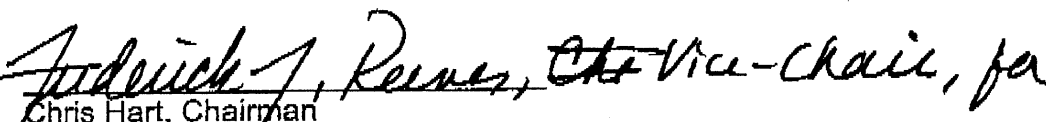
The project, including both the dredging and the planned dredged material disposal, will impact "Natural Resources of Regional Significance" in *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region* (FRSRPP). Impacts could occur to designated wetlands, Priority Wetlands for Species (7+), and Rare/Endangered Species Occurrences. Pursuant to FRSRPP Policies 4.5.1, 4.5.2, and 4.5.6, it must be determined that the proposed impacts are of over-riding public interest. Mitigation ratios at a minimum of 4 created:1 impacted or 8 restored:1 impacted are recommended for impacts to such resources.

The Council's Agency on Bay Management has also reviewed the project and its comments are attached to this report.

Concerns are that the proposed additional filling of Hillsborough Bay (159 acres) will further exacerbate the poor circulation and flushing of the Bay; and that impacts to the southern shoreline and shallow waters of the Alafia River are avoidable. Alternative disposal sites, including the western shore of Egmont Key, uplands, and other opportunities for beneficial use should be further investigated.

Further, it is recommended that any additional comments addressing local concerns be considered prior to final action.

Council adopted July 10, 2000


Chris Hart, Chairman
Tampa Bay Regional Planning Council

This project has been reviewed for consistency with the Council's adopted growth policy, *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region*. Until the aforementioned concerns are reconciled, this proposal is not consistent with Council policies.

PLEASE NOTE: The Committee's comments constitute compliance with Florida's Intergovernmental Coordination and Review process only.

Pertinent Council policies are:

4.1.6: Prohibit new dredging, channelization or other alterations which result in water quality degradation in or adjacent to regionally-significant natural systems such as intertidal, estuarine, riverine or special habitats. This provision is not intended to prohibit channel improvements at Port Manatee, Port of Tampa or the Port of St. Petersburg; but such improvements need to be sensitive to regionally-significant natural resources.

4.5.1: Protect, preserve and restore all regionally-significant natural resources shown on the Map of Regionally-Significant Natural Resources.

4.5.2: Impacts to regionally-significant natural resources shall be allowed only in cases of overriding public interest and when it is demonstrated and/or documented that the mitigation will successfully recreate the specific resource. Mitigation should meet the following minimum ratios:

- Intertidal habitats 3:1
- Coastal strand and barrier islands 3:1
- Open water marine and estuarine habitats 4:1

•	Beaches	2:1
•	Riverine habitats	3:1
•	Lake habitats	3:1
•	Special habitats	2:1

4.5.6: Mitigation by restoring disturbed habitat of a similar nature, including the removal of exotic plant species, may be acceptable. The minimum acceptable ratio shall be twice the habitat re-creation ratio set forth in policy 4.5.2.

4.5.14: Prohibit channelization through regionally-significant natural systems such as intertidal, estuarine, riverine and special habitats; solely to create new lands for development; or to create new navigation access.

4.6.5: Discourage projects which could alter natural tidal circulation. Necessary projects which would alter circulation shall minimize impact to tidal circulation and flushing and mitigate unavoidable impacts.

4.7.1: Prevent the dredging or filling of submerged lands not previously subject to dredging or filling, except in cases of overriding public interest that protect regionally-significant natural resources.

4.7.2: Uncontaminated dredged material shall be considered a resource to be utilized for appropriate beneficial uses such as recreation and wildlife habitat. Require revegetation plans for spoil areas utilizing appropriate native plant species.

4.7.4: Encourage the development and use of innovative and efficient dredged material disposal methods which reduce adverse environmental impacts and financial costs of dredged material disposal.

4.7.6: Regionally-significant natural resources shall be protected from adverse effects of dredge and fill activities.

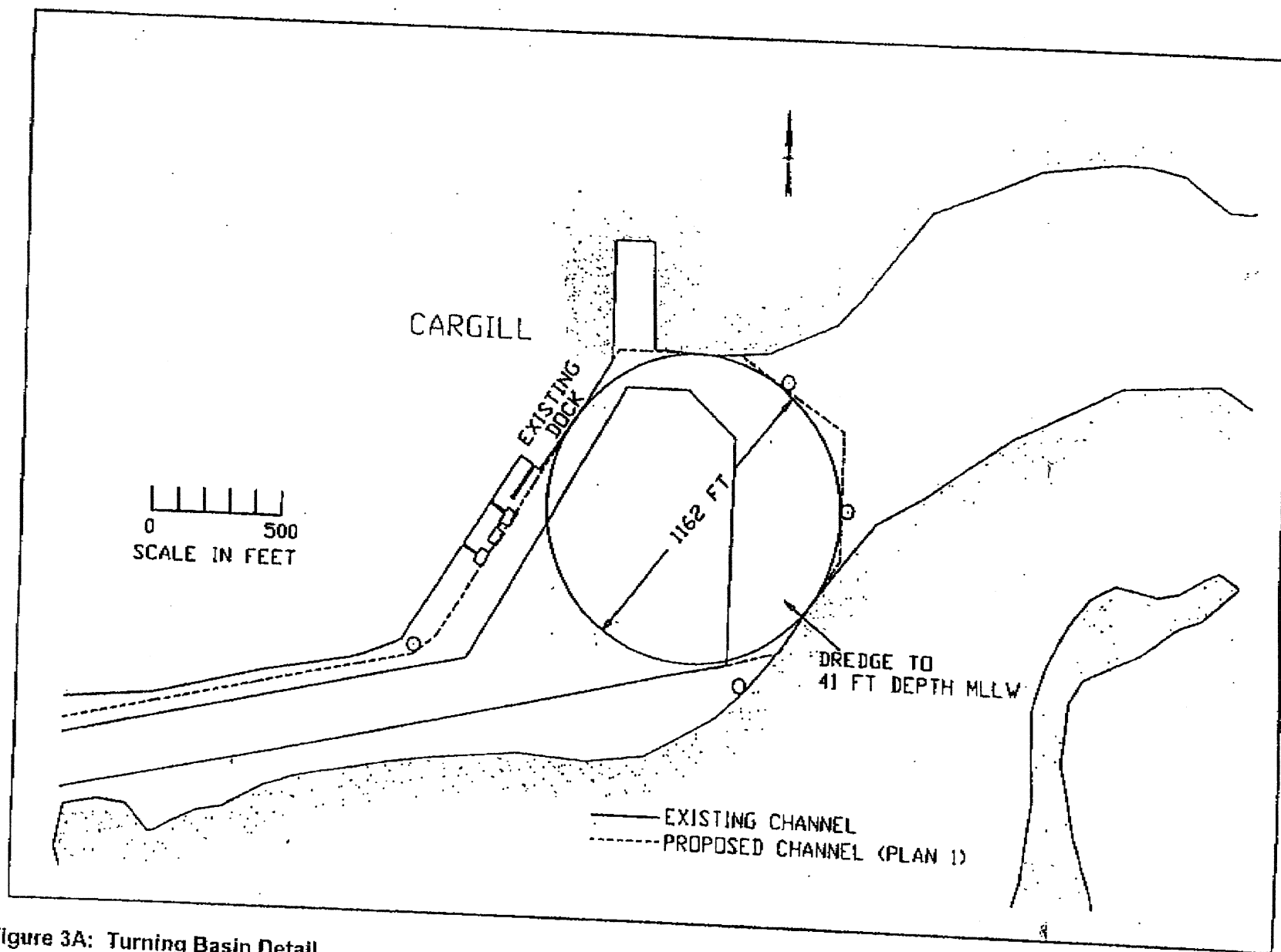


Figure 3A: Turning Basin Detail

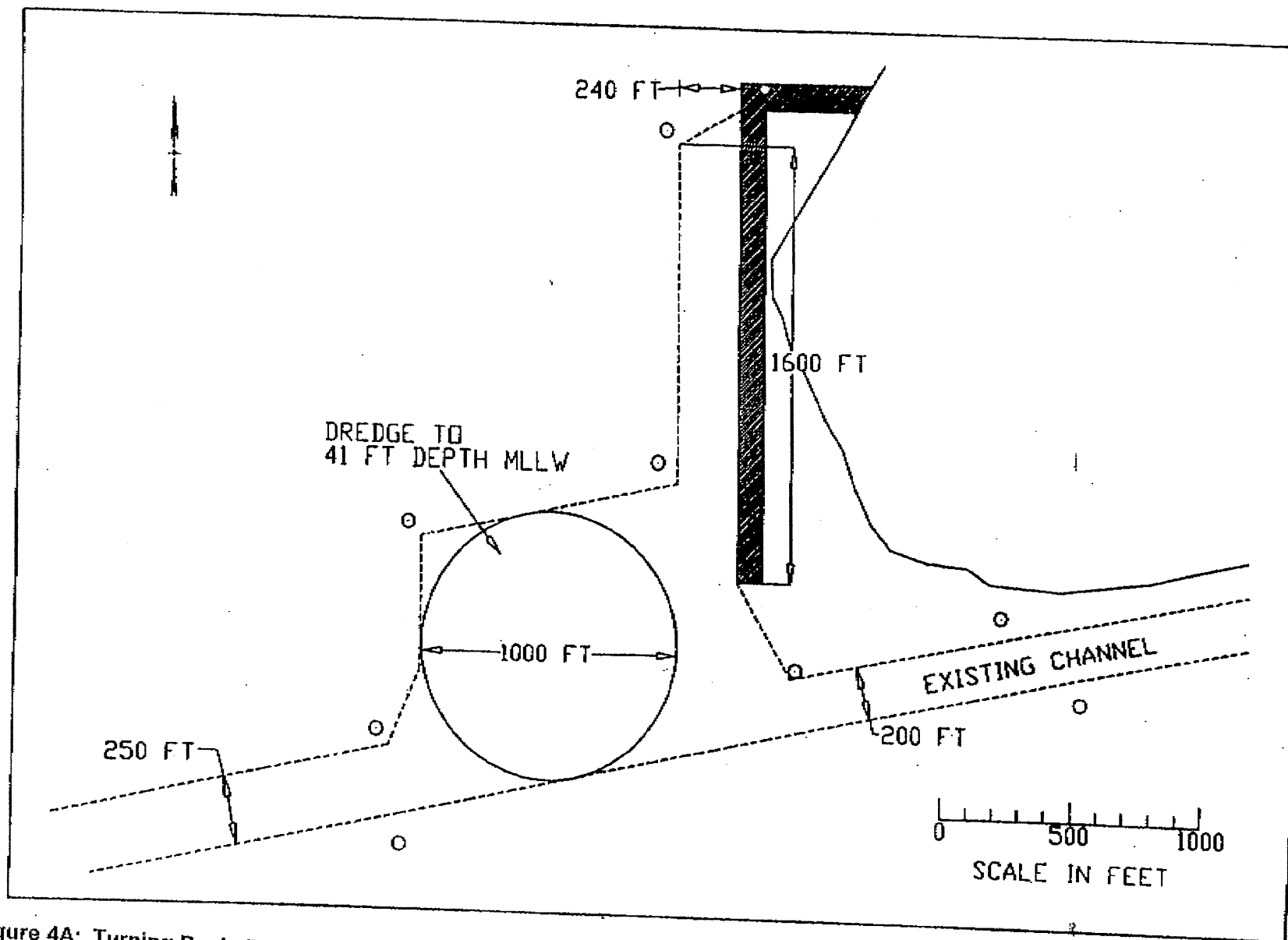
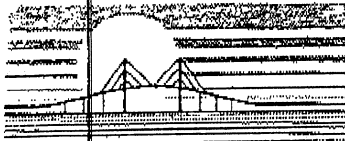


Figure 4A: Turning Basin Detail



*Tampa Bay Regional Planning Council
Agency on Bay Management*

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**An Alliance of Agencies,
Organizations and
Interest Groups for the
Management of Tampa Bay**

Tampa Bay Regional Planning Council
Florida Senate
Florida House of Representatives
Tampa Bay Estuary Program
FL Department of Environmental
Protection
FL Marine Research Institute
FL Department of Transportation
FL Fish and Wildlife Conservation
Commission
Southwest FL Water Management
District
Environ. Protection Comm. of
Hillsborough County
Hillsborough County Planning
Commission
IFAS / Florida Sea Grant
National Audubon Society
Manasota 88
League of Women Voters'
Environmental Coalition
Sierra Club
Tampa BayWatch
Center for Marine Conservation
Coastal Conservation Association of FL
Egmont Key Alliance
Tampa Bay Pilots
Commercial Fishermen
Recreational Interests
Tampa Bay Partnership
Contractors and Builders Association of
Pinellas County
National Marine Fisheries Service
U.S. Army Corps of Engineers
U.S. Coast Guard -
Marine Safety Office
U.S. Fish and Wildlife Service
U.S. Geological Survey
MacDill Air Force Base
Post, Buckley
Cargill Fertilizer, Inc.
IMC-Agrico Fertilizer
Florida Petroleum Council
Florida Power Corporation
Tampa Electric Company
Florida Power & Light Company
Manatee County Port Authority
Port of St. Petersburg
Tampa Port Authority
Hillsborough County
Manatee County
Pasco County
Pinellas County
City of Clearwater
City of St. Petersburg
City of Tampa
Eckerd College
Hillsborough Community College
USF Marine Science/
Tampa Bay PORTS

June 14, 2000

Commissioner Chris Hart, Chairman
Tampa Bay Regional Planning Council
9455 Koger Boulevard
St. Petersburg, FL 33702.

Dear Chairman Hart:

RE: Tampa Harbor-Alafia River, Feasibility Report with Draft
Environmental Assessment

At its meeting on June 8, 2000, the Natural Resources/Environmental Impact Review Committee of the Agency on Bay Management received a presentation on the above-referenced project from the US Army Corps of Engineers and discussed the plan at length. It voted unanimously to adopt these positions and recommendations and to forward them to the appropriate entities.

The proposed project includes enlarging and deepening the turning basin and navigational channel which serves the Cargill facility at the mouth of the Alafia River in central Hillsborough County. Wetland and shallow water habitat would be impacted and approximately 5.5 million cubic yards of dredged material would be generated.

It was recognized that a substantial effort has been made to design a project which would result in reduced environmental impacts. Concerns were raised regarding construction of a federal project to serve a single user, some of the proposed methods of spoil disposal, the amount of filling that has already occurred in Hillsborough Bay, and avoidable impacts to the shoreline of the Alafia River.

The Agency on Bay Management's Natural Resources/Environmental Impact Review Committee position on the proposed project is:

1. The US Army Corps of Engineers should keep its policy of not funding projects which benefit a single user;
2. Any Bay bottom involved in the project not already owned by the Tampa Port Authority should be deed to the Authority;
3. There should be no filling in Hillsborough Bay to create new uplands from Bay bottom; and

4. The proposed footprint of the turning basin should be shifted to the north and east, so as not to impact the south shore of the Alafia River.

It is also recommended that any dredged material which is suitable for the purpose be used to help stabilize the shoreline of Egmont Key.

Thank you for considering these comments in the Tampa Bay Regional Planning Council's review of the project for the State Clearinghouse.

Sincerely,



George Henderson
Co-Chair, Natural Resources/Environmental
Impact Review Committee

cc: Mr. William Fonferek
Mr. Gray Gordon
Mr. Dave Parsche
Ms. Barbara Romano

05/26/2000 16:09 570-5118

PLANNING

PAGE 03

Hillsborough County
City-County
Planning
Commission

THE PLANNING COMMISSION

Ronald A. Govin
Chairman

June 12, 2000

Jacqueline R. Wilson
Vice-Chairman

Ms. Kristi Thum

Christine Malzone
Member-at-Large

Tampa Bay Regional Planning Council

9455 Koger Blvd. Suite 219

St. Petersburg, FL 33702-2491

James N. Beejer, Jr.
Dottie Berger
Terri G. Cobb
Bruce P. Cury

RE: Draft Feasibility Report and Draft Environmental Assessment -
Navigational Study for Tampa Harbor - Alafia River -
SAI# FL199802020037CR

Barbara H. Dowling
J.E. (Dorley) Houghtaling
Vivian M. Kitchen

Robert B. Hunter, AICP
Executive Director

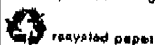
Dear Ms. Thum:

The Planning Commission has completed its review of the Florida State Clearinghouse Local Government Coordination Routing Slip for the Draft Feasibility Report and Draft Environmental Assessment of the Navigational Study for Tampa Harbor on the Alafia River (SAI# FL199802020037CR).

The Planning Commission would like to express the following concerns regarding the proposed project:

1. Based on the information provided, the benefits of this project would primarily accrue to a single user. Only one private corporation has facilities which could be expected to benefit from this project. As such, Federal funding of this project would be inconsistent with the "single owner policy."
2. Additional clarification is recommended regarding the Cost/benefit analysis. It appears to suggest that benefits would accrue as a result of the project in terms of the transport of phosphate products, sulfur and ammonia. However, our information suggests that sulfur and ammonia are commonly transported in vessels smaller than the Panamax class, for which this project is designed to serve. Moreover, we know of no plans to bring ammonia into this area and only limited amounts of sulfur could be expected due to the development of an alternative sulfur facility located at another site.
3. Opportunities for moving the turning basin to the north should be further investigated in order to avoid impacts to mangrove wetlands and shallow bottom communities.

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http://www.plancom.org



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4. Documentation suggests that the sediments in the project area contain elevated levels of cadmium, chromium, lead, mercury, zinc, and PCB's. We would recommend a more thorough analysis as to the risk of exposing these contaminants to the water column and the risks of the proposed beneficial use of this dredge material.
5. Water quality in the project area has been documented as poor, especially in regard to dissolved oxygen levels. Additional analysis is recommended to determine the proposed project's potential long term impact on water quality, especially in regard to dissolved oxygen levels, water circulation and flushing.
6. Rip-rap and revetments are proposed to stabilize the newly created mangrove fringe shoreline along the southern shore of the turning basin. Additional information and analysis is recommended to evaluate the design and engineering of this new shoreline in terms of its hydro-Biologic benefit and value relative to natural, unhardened mangrove fringe shoreline.
7. The Project will result in the loss of 34 acres of shallow water, benthic habitat. Proposed beneficial use projects are suggested to have the potential to mitigate for this loss. However, hydro-dynamic modeling indicates that proposed beneficial use project sites experience heavy erosion. Furthermore, the location of the proposed beneficial use projects exhibit current environmental benefits which could be impacted by the deposition of dredge material. We recommend that a careful analysis be conducted of the proposed beneficial use sites, including the potential for erosion of contaminant laden dredge material and loss of existing productive habitat.

Thank you for the opportunity to participate in this process. Should you have any questions please contact us at (813) 272-5940.

Sincerely,



Shawn C. College, AICP
Senior Planner

CC: Al Eisenmenger, Executive Planner
James Duck, ACOE

L:\enviro\reviews\icr\alafia navigation



STATE OF FLORIDA
DEPARTMENT OF COMMUNITY AFFAIRS

"Dedicated to making Florida a better place to call home"

JEB BUSH
Governor

STEVEN M. SEIBERT
Secretary

September 11, 2000

Mr. Bill Fonferek
Department of the Army
Jacksonville District Corps of Engineers
Post Office Box 4970
Jacksonville, Florida 32232-0019

RE: Department of the Army - District Corps of Engineers - Draft Feasibility Report
and Draft Environmental Assessment - Navigation Study for Tampa Harbor -
Alafia River - May 2000 - Hillsborough County, Florida
SAI: FL199802020037CR

Dear Mr. Fonferek:

The Florida State Clearinghouse, pursuant to Presidential Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4321, 4331-4335, 4341-4347, as amended, has coordinated a review of the above-referenced project.

The Florida Fish and Wildlife Conservation Commission (FWC) notes that the attached comments were provided directly to the Florida Department of Environmental Protection. Please refer to the enclosed FWC comments.

The Department of Environmental Protection (DEP) offers a number of comments noting questions and concerns regarding the preferred alternative and the information presented in the Environmental Assessment (EA). DEP notes that the EA should be revised or supplemented to address identified issues and information gaps by (a) expanding the description and acreage of resources that would be impacted by the project; (b) thoroughly documenting all appropriate means to avoid and minimize those impacts; and (c) including a comprehensive mitigation plan to fully compensate for unavoidable losses. DEP will determine the consistency of the project upon reviewing the supplemental information submitted. Please refer to the enclosed DEP comments.

2555 SHUMARD OAK BOULEVARD • TALLAHASSEE, FLORIDA 32399-2100

Phone: 850.488.8466/Suncom 278.8466 FAX: 850.921.0781/Suncom 291.0781

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Tallahassee, FL 32399-2100
(850) 488-7956

Mr. Bill Fonferek
September 11, 2000
Page Two

Based on the information contained in the draft feasibility report and draft environmental assessment and the enclosed comments provided by our reviewing agencies, the state has determined that, at this stage, the above-referenced project is consistent with the Florida Coastal Management Program (FCMP). All subsequent environmental documents prepared for this project must be reviewed to determine the project's continued consistency with the FCMP. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews.

In addition, comments expressing several concerns were received from the Tampa Bay Regional Planning Council (TBRPC) and Hillsborough County. The comments received from the TBRPC and Hillsborough County are enclosed for your review and consideration.

Thank you for the opportunity to review the above-referenced documents. If you have any questions regarding this letter, please contact Ms. Cherie Trainor, Clearinghouse Coordinator, at (850) 414-5495.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. Cantral', written in a cursive style.

Ralph Cantral, Executive Director
Florida Coastal Management Program

RC/cc

Enclosures

cc: Bradley Hartman, Florida Fish and Wildlife Conservation Commission
Lynn Griffin, Department of Environmental Protection
Angela Hurley, Tampa Bay Regional Planning Council
Shawn College, Hillsborough County



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

August 23, 2000

Ms. Cherie Trainor
State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100

RE: USCOE/Draft Feasibility Report and Draft Environmental Assessment
Navigation Study for Tampa Harbor-Alafia River, Hillsborough County
SAI: FL98-0037CR

Dear Ms. Trainor:

The Department of Environmental Protection has reviewed the referenced draft Feasibility Report and draft Environmental Assessment (EA) of a project that would deepen the Alafia River Channel in Tampa Harbor and expand the turning basin at the Cargill Fertilizer site.

In addition to its review of the captioned project, the Department is also processing an environmental resource permit (ERP) for certain other improvements at the Cargill facility. The EA under review evaluates the *next* phase of navigation improvements at the site, which are not covered by the ERP currently being processed. A separate ERP will be required for the project described in the EA, and the proposed beneficial use of dredged material will be evaluated as part of the permit review process. Sediment quality and elutriate analyses will be required to determine the suitability for disposal to create shallow water or intertidal habitat.

The Department has the following questions and concerns about the preferred alternative for the project and the information presented in the Environmental Assessment:

1. The Summary of Environmental Effects in the Feasibility Report and Section 4.3.2 of the EA state that 0.275 acres of mangrove will be impacted by the project. There is no mention of impacts that will occur to other wetlands, which include restored and naturally occurring tidal marsh, restored depressional fresh water wetlands, and possibly the restored river channel, all of which are located on the South Parcel. During the site inspection of August 3, the Department confirmed that the project will impact significantly more than 0.275 acres of fringe mangrove. All wetland losses should be quantified and evaluated in the EA; acreage should be based on a determination of the state's regulatory jurisdiction.

"More Protection, Less Process"

Printed on recycled paper.

Ms. Cherie Trainor
August 23, 2000
Page Two

2. Although mitigation can only be formally reviewed and approved through the environmental resource permit process after wetland impacts have been sufficiently avoided and minimized, it is clear that the EA significantly underestimates wetland impacts (0.275 acres) and, therefore, the amount of mitigation that will be required. The EA should describe an acceptable mitigation proposal based on the total wetland acreage and type. Department staff are available to provide preliminary guidance on acceptable mitigation strategies for impacts to wetlands and other lands subject to a South Parcel conservation easement.

3. The restoration project on the South Parcel is listed in 3.3.2m of the Draft Environmental Assessment as a "Relevant (Biological) Factor of the Environment" that would be affected by the dredging activity. The Draft EA does not, however, include a plan to mitigate impacts to the restoration project. There is a signed agreement to protect a portion of the affected property under a conservation easement. Any impacts to property covered by the easement must be determined to be "in the public interest" and will have to be compensated through mitigation and other measures that result in a net environmental benefit.

4. Section 4.3.1b of the Draft EA (Environmental Consequences of Expansion of Existing Channel and Turning Basin) states that completion of the preferred alternative would result in a loss of 34 acres of benthic habitat. Table 1 states that there would be a loss of 19 acres of benthic habitat under the preferred alternative. The discrepancy needs to be reconciled.

5. Section 4.7.2b references the long-term creation of a 272-acre site to provide substantial nesting and foraging area for birds upon completion of the preferred alternative. Table 1 states that there will be an increase of 67 acres of bird nesting and foraging area. The discrepancy needs to be addressed so that Section 4.7.2b and Table 1 are consistent.

6. Text has been omitted at the page break in Section 3.3.3 (Social and Cultural Resources) on pages 24 - 25 of the Draft EA, precluding a meaningful review of the section.

7. The assessment does not contain Appendix I (Endangered Species Consultation).

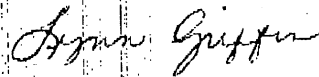
At this time, the Corps of Engineers does not support the dredging project and recommends that it not be pursued. The basis for the decision is that the proposed improvements would serve a single user (Cargill), which is inconsistent with current Corps policy. The environmental conclusion of the EA is that the preferred alternative would have no significant impact. That conclusion is not supported by the findings in the environmental assessment, primarily because the description of the affected environment is incomplete and the proposed mitigation is inadequate.

Ms. Cherie Trainor
August 23, 2000
Page Three

The environmental assessment should be revised or supplemented to address identified issues and information gaps by (a) expanding the description and acreage of resources that would be affected by the project; (b) thoroughly documenting all appropriate means to avoid and minimize those impacts; and (c) including a comprehensive mitigation plan to fully compensate for unavoidable losses in accordance with the requirements of Section 373.414, F.S., and the conservation easement on the South Parcel. The Department will determine the consistency of the project upon reviewing the supplemental information submitted.

We appreciate the opportunity to review the draft EA for the Tampa Harbor/Alafia River Channel dredging project. Consultation with the Department's Southwest District Office in Tampa concerning jurisdictional boundaries, mitigation options and permit requirements is recommended. Please feel free to call me at 487-2231 if you have any questions concerning our comments.

Sincerely,



Lynn Griffin
Environmental Administrator
Office of Intergovernmental Programs

/seg

cc: Deborah Getzoff, SW District

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION



JAMES L. "JAMIE" ADAMS, JR.
Bushnell

BARBARA C. BARSH
Jacksonville

QUINTON L. HEDGEPEETH, DDS
Miami

H.A. "HERKY" HUFFMAN
Deltona

DAVID K. MEEHAN
St. Petersburg

JULIE K. MORRIS
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EDWIN P. ROBERTS, DC
Pensacola

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ALLAN L. EGBERT, Ph.D., Executive Director
VICTOR J. HELLER, Assistant Executive Director

OFFICE OF ENVIRONMENTAL SERVICES
BRADLEY J. HARTMAN, DIRECTOR
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FAX (850)922-5679

July 20, 2000

Ms. Cherie Trainor
Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

RE: SAI 199802020037CR, Hillsborough
County, Alafia River Navigation
Study, U.S. Army Corps of
Engineers

Dear Ms. Trainor:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission has reviewed the referenced project, and provided the attached comments, dated July 10, 2000, to the Florida Department of Environmental Protection.

Sincerely,

A handwritten signature in black ink that reads "Bradley J. Hartman, for".

Bradley J. Hartman
Office of Environmental Services

BH/ps
ENV 1-3-2
J:\oes\paula\saicoverletter
Enclosure

FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION



JAMES L. "JAMIE" ADAMS, JR.
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ALLAN L. EGBERT, Ph.D., Executive Director
VICTOR J. HELLER, Assistant Executive Director

July 10, 2000

OFFICE OF ENVIRONMENTAL SERVICES
BRADLEY J. HARTMAN, DIRECTOR
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FAX (850)922-5679

Mr. Mark Peterson
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RE: File No. 29-01562913-001, Cargill
Berth Expansion, Hillsborough
County

Dear Mr. Peterson:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission (FWC) has reviewed the referenced permit application and offers the following comments. Our comments will also be submitted to the U.S. Army Corps of Engineers, in compliance with the Fish and Wildlife Coordination Act.

The initial proposed project (Phase I) consists of the expansion of an existing phosphate loading dock, construction of an unloading dock for sulfur pellets, dredging of the unloading dock area, dredging of the Alafia River turning basin, and dredging of the existing north berth. If federal funds become available, the Hillsborough Bay and Alafia River Channels may be dredged to a depth of -41 feet mean low water (MLW) with an over-dredge of plus 2 feet. If this channel dredging occurs, then Cargill will propose Phase II, which includes upgrading the existing docking facility and turning basin to accommodate larger vessels.

The Cargill Fertilizer Inc. Berthing Facility is located on the north side of the Alafia Turning Basin near the mouth of the Alafia River, on Hillsborough Bay. The initial project impacts include 5.1 acres of submerged bottoms, 0.28 acres of littoral shallows, 0.43 acres of ditch wetlands, and 4.89 acres of uplands. The Phase II portion of the project will impact 9.59 acres of submerged bottoms, 1.07 acres of littoral shallows, 2.07 acres of ditch wetlands, and 2.41 acres of uplands.

As mitigation for Phase I impacts, Cargill is proposing a 2:1 ratio for wetlands impacts and a 1:1 ratio for impacts to littoral shallows, for a total of 1.14 acres of mitigation. This mitigation would include exotic plant removal, grading to wetland elevations, and planting of native wetland vegetation at a site east of U.S. 41, south of Delaney Creek. Mitigation for Phase II impacts involves 5.21 acres of wetland enhancement/creation at the same mitigation site. No mitigation is proposed for impacts to submerged bottoms or impacts to uplands. Spoil from the proposed dredging activity would be placed at an existing Storage Site C.

Mr. Mark Peterson
July 10, 2000
Page 2

Manatee use of this area is documented by aerial survey, mortality, and satellite telemetry data. The discharge at the Gardiner Phosphate plant located in the Alafia River received heavy use by manatees in the 1980s, but reduced discharge may have lowered the number of animals that visit the river. Even with this decrease in discharge, there appears to be substantial use of the river by manatees. Between January 1974 and February 2000, 40 manatees have died within a 5-mile radius of the project location. Over half of these deaths (54%) have occurred within the past five years, with 85% occurring in the 1990s. Thirty-three percent of these deaths were watercraft-related. The river may also be a preferred calving area, due to the high incidence of perinatal manatee deaths. Six dependent calves have died in the river between January 1974 and February 2000, half of which have occurred in the 1990s.

The applicant has agreed to use the standard manatee protection conditions during dredging. To satisfy the requirements of 373.414(1)(a)2, Florida Statutes, the additional conditions listed in Attachment A to this letter should be made a part of this permit.

Listed sea turtles, including the loggerhead (threatened) and Atlantic ridley (endangered), are known in the project area. The applicant states that hydraulic dredging will minimize the potential for sea turtle impacts.

Little blue heron (species of special concern - SSC), roseate spoonbill (SSC), yellow-crowned night-herons, and great blue herons forage in the wetland shoreline that will be impacted by Phase I.

Depending upon water level conditions, foraging wading birds, and migratory shorebirds, waterfowl, and raptors visit and winter at Storage Site C. The National Audubon Society has monitored shorebird nesting activity at Storage Site C intermittently for the last 15+ years.

Storage Site C is a documented nesting area for black-necked stilts and gull-billed terns. Black-necked stilts nest in many, but not all, years. Probably the key factor is the amount of standing water present; stilts nest on bare flats or on low bars and feed in adjacent shallows. If water is too deep, flats are not exposed, and if the flats are completely dry, there is no food. The nesting season is May through July, with some late nesters possibly still caring for non-flying young into August. Numbers of stilts have varied from year to year, but in 1989 and 1997 there were an estimated 50 nesting pairs. Nesting birds are very vulnerable to flooding from summer rains.

Gull-billed terns occasionally nest among the stilts. This is a rare species locally and in Florida, with 1-3 pairs typically occurring at Site C in years when they are present. Their nesting season and preferred habitat are the same as for black-necked stilts.

The site has the potential to be used for nesting by common moorhens, black skimmers, American avocets, and mottled ducks. Common moorhens nest in an adjacent pond and mottled ducks nest nearby, and might use the site when flooded. A wide variety of migrant and wintering shorebirds (e.g., sandpipers and plovers) use Storage Site C when conditions are appropriate.

Mr. Mark Peterson
July 10, 2000
Page 3

Shallow water and partially exposed flats offer valuable foraging and roosting sites. Peak migration months are August-October (fall), and April-May (spring). Numbers can exceed 1,000 or more birds. When sufficiently flooded, the storage site is important for migrant and wintering ducks, particularly northern shovelers (up to 500 or more). Scarcer species include ruddy duck, lesser scaup, ring-necked duck, pintail, American wigeon, mottled duck, green-winged teal, and blue-winged teal.

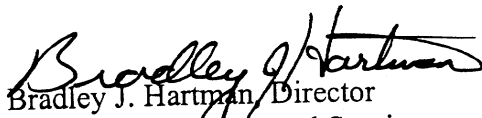
We recommend that a bird protection management plan, including avoidance of impact to nests, be developed for Phase I of this project. The plan should be submitted for review and comment by the U.S. Fish and Wildlife Service, FWC, and Mr. Rich Paul of the National Audubon Society. The final approved plan should become part of the proposed permit. If Storage Site C will be eliminated as long-term useful habitat for these species, mitigation measures will need to be proposed.

West of the mouth of the Alafia River and south of the shipping channels are Bird Island and Sunken Island, also known as the Alafia Bank. These islands comprise one of the largest and most diverse bird rookeries in the United States, with a total of 18,000 pairs of 16 species of birds nesting in 1998. In order to protect this rookery, dredging equipment and operations need to be stored/anchored on the north side of the channel, away from the islands. This protocol should be included in the bird protection management plan for this project.

The cumulative effects of larger vessels on listed species occurring in the project area needs to be assessed, particularly for species subject to vessel impacts. Cumulative impacts should be factored into the functional assessment of project impacts prior to assessment of mitigation measures.

Phase II of the project should not be permitted at this time. A matter of potential concern is the stability of the Alafia Bank if the Hillsborough Bay and Alafia River Channels are deepened. We have observed losses of deltaic islands at passes and river mouths that previously served as bird nesting areas after dredging of deep channels and/or removal of submerged shoals. A study of the effects of Phase I and of the proposed channel deepening should be completed before consideration of Phase II proposals.

Sincerely,


Bradley J. Hartman, Director
Office of Environmental Services

BJH/JWB
cargillb
ENV 1-2-2
Enclosure

Mr. Mark Peterson
July 10, 2000
Page 4

cc: Mr. James Y. Zinner
URS Greiner Woodward Clyde
7750 West Courtney Campbell Causeway
Tampa, Florida 33607-1462

Mr. Ozzie Morris
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Tampa Port Authority
Office of Environmental Affairs
P.O. Box 2192
Tampa, Florida 33601

U.S. Fish and Wildlife Service
9549 Koger Boulevard, Suite 111
St. Petersburg, Florida 33702

Mr. Joe Bacheler
Chief, Tampa Regulatory Field Office
U.S. Army Corps of Engineers
P.O. Box 19247
Tampa, Florida 33686-9247

Ms. Nancy Douglass, Regional Nongame Biologist
Florida Fish and Wildlife Conservation Commission
Division of Wildlife, Bureau of Nongame Wildlife
3900 Drane Field Road
Lakeland, Florida 33811

Mr. Rich Paul
Refuge Manager
National Audubon Society
410 Ware Boulevard, Suite 500
Tampa, Florida 33619

**Attachment A—Recommended Additional Permit Conditions for the
Protection of the West Indian Manatee**

1. At least one person shall be designated as a manatee observer when in-water work is being performed. That person shall have experience in manatee observation, and be equipped with polarized sunglasses to aid in observation. The manatee observer must be on site during all in-water construction activities and will advise personnel to cease operation upon sighting a manatee within 50 feet of any in-water construction activity. Movement of a work barge, other associated vessels, or any in-water work shall be minimized to the extent possible after sunset, when the possibility of spotting manatees is negligible.
2. To reduce the risk of a vessel crushing a manatee during docking and/or mooring, fenders or buoys between a bulkhead/wharf and a vessel, or between two vessels rafted together, shall be installed, used, and maintained for the life of the facility. The fenders and/or buoys shall provide at least three feet of standoff space under maximum operational compression, and shall be installed above mean high water. A cantilevered bulkhead/wharf may be used as an alternative to fenders if constructed above mean high water and if sufficient standoff space is provided.
3. To reduce the risk of entrapment and drowning of manatees, grating shall be installed over culvert pipes greater than 18 inches, but smaller than six feet in diameter. Bars or grates no more than 8 inches apart shall be placed on the accessible end(s) to restrict manatee access. The installation of grates applies to any submerged or partially submerged pipes and culverts accessible to manatees during any tidal phase.
4. In order to provide protection to manatees during the operation of this facility, permanent manatee information and/or awareness sign(s) shall be installed and maintained to increase boater awareness of the presence of manatees, and of the need to minimize the threat of boats to these animals. The signs shall be installed prior to the facility opening and beginning operations, should be replaced in the event the signs fade or become damaged, and shall be maintained for the life of the facility. The number, type, and procedure for installation should be in accordance with "Permanent Manatee Signs", which can be obtained from the Bureau of Protected Species Management, 620 S. Meridian Street, Tallahassee, FL 32399-1600 (phone 850/922-4330).

COUNTY: Hillsborough

DATE: 05/15/2000

COMMENTS DUE DATE: 06/14/2000

CLEARANCE DUE DATE: 06/29/2000

Message:

SAI#: FL199802020037CR

STATE AGENCIES

WATER MANAGEMENT DISTRICTS

OPB POLICY UNITS

Community Affairs
Environmental Protection
Fish & Wildlife Conserv. Comm
☒ State
Transportation

Southwest Florida WMD

Environmental Policy/C & ED

Hillsborough
SAI-Corps-EA
2000-03598

May survey previously
reviewed 12/2/99 - complete
& sufficient - avoid ~~potentially~~
sig anomalies
Ref: 2000-03657 & 997624

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

— Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.

☒ Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.

— Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.

— Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

Project Description:

Department of the Army - District Corps of Engineers - Draft Feasibility Report and Draft Environmental Assessment - Navigation Study for Tampa Harbor - Alafia River - May 2000 - Hillsborough County, Florida. also on the internet at:
<http://www.saj.usace.army.mil/pd/env-doc.htm>

To: Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
(850) 922-5438 (SC 292-5438)
(850) 414-0479 (FAX)

EO. 12372/NEPA

- ☒ No Comment
☐ Comments Attached
☐ Not Applicable

Federal Consistency

- ☒ No Comment/Consistent
☐ Consistent/Comments Attached
☐ Inconsistent/Comments Attached
☐ Not Applicable

From:

Division/Bureau: DHR / SHP

Reviewer: P. Yates

Date: 6-8-00

James H. McArthur 6/12/2000



Florida Department of Transportation

JEB BUSH
GOVERNOR

605 Suwannee Street
Tallahassee, Florida 32399-0450

THOMAS E. BARRY, JR.
SECRETARY

June 6, 2000

Cherie Trainor
Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida, 32399-2100

JUN 8 2000
FLORIDA STATE CLEARINGHOUSE

**Re: Draft Feasibility Report and Draft Environmental Assessment-Navigation Study
for Tampa Harbor-Alafia River, Hillsborough County.
SAI # FL199802020037CR**

Dear Ms. Trainor:

The Department has reviewed the subject application and has no comments.

Sincerely,

Larry B. Phillips
Intermodal Specialist/Seaport Office

cc: Donald J. Skelton, D-7
Harry Reed, D-7
Sandra Whitmire
File



Southwest Florida Water Management District

2379 Broad Street, Brooksville, Florida 34609-6899
(352) 796-7211 or 1-800-423-1476 (FL only)
SUNCOM 628-4150 TDD only 1-800-231-6103 (FL only)
World Wide Web: <http://www.swfwmd.state.fl.us>

Tampa Service Office
7601 Highway 301 North
Tampa, Florida 33637-6759
(813) 985-7481 or
1-800-836-0797 (FL only)
SUNCOM 578-2070

Bartow Service Office
170 Century Boulevard
Bartow, Florida 33830-7700
(863) 534-1448 or
1-800-492-7862 (FL only)
SUNCOM 572-6200

Venice Service Office
115 Corporation Way
Venice, Florida 34292-3524
(941) 486-1212 or
1-800-320-3503 (FL only)
SUNCOM 526-6900

Lecanto Service Office
3600 West Sovereign Path
Suite 226
Lecanto, Florida 34461-8070
(352) 527-8131
SUNCOM 667-3271

June 1, 2000

Ronald C. Johnson
Chair, Lake Wales
Brenda Menendez
Vice Chair, Tampa
Sally Thompson
Secretary, Tampa
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Watson L. Haynes, II
St. Petersburg
John K. Renke, III
New Port Richey
Pamela Stinnette-Taylor
Tampa

E. D. "Sonny" Vergara
Executive Director
Gene A. Heath
Assistant Executive Director
Edward B. Helvenston
General Counsel

Ms. Cherie Trainor
Florida State Clearinghouse
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Subject: **Department of the Army- District Corps of Engineers-
Navigation Study for Tampa Harbor- Hillsborough
County, Florida; SAI#: FL199802020037CR**

Dear Ms. Trainor:

The staff of the Southwest Florida Water Management District (District) has conducted a consistency evaluation for the referenced project. Consistency findings are divided into four categories and are based solely on the information provided in the subject application.

FINDING	CATEGORY
X	Consistent/No Comment
	Consistent/Comments Attached
	Inconsistent/Comments Attached
	Consistency Cannot be Determined Without an Environmental Assessment Report/Comments Attached

The District appreciates the opportunity to participate in the review of this application. Please be advised that our review does not constitute permit approval under Chapter 373, Florida Statutes, or any rules promulgated thereunder, nor does it stand in lieu of normal permitting procedures in accordance with Florida Statutes and District rules.

COUNTY: Hillsborough

DATE: 05/15/2000
COMMENTS DUE DATE: 06/14/2000
CLEARANCE DUE DATE: 06/29/2000
SAI#: FL199802020037CR

Message:

STATE AGENCIES

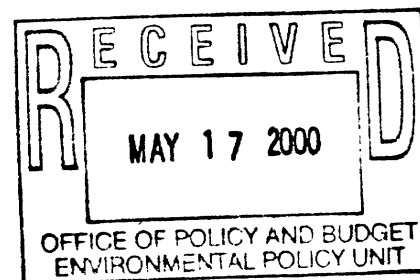
Community Affairs
Environmental Protection
Fish & Wildlife Conserv. Comm
State
Transportation

WATER MANAGEMENT DISTRICTS

Southwest Florida WMD

OPB POLICY UNITS

X Environmental Policy/C & ED



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- X Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.
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Project Description:

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To: Florida State Clearinghouse

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EO. 12372/NEPA

- ☒ No Comment
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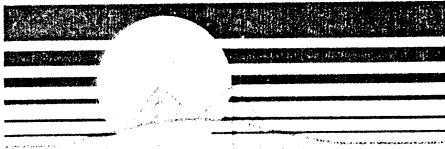
From:

Division/Bureau:

Reviewer:

Date:

DPB / Env. Policy Unit
Carla [Signature]
6-26-00



Tampa Bay Regional Planning Council

Chairman
Commissioner Chris Hart

Vice-Chairman
Frederick T. Reeves

Secretary/Treasurer
Mayor Pat Whitesel

Executive Director
Manny L. Pumariega

July 10, 2000

Ms. Cherie L. Trainor, Coordinator
Florida State Clearinghouse
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

Subject: IC&R #163-00, Environmental Assessment for Tampa Harbor/Alafia
River Channel Expansion, SAI #FL199802020037C, Hillsborough
County

Dear Ms. Trainor:

The aforementioned project was reviewed for consistency with the Tampa Bay Regional Planning Council's *Strategic Regional Policy Plan*. The attached report was approved by the Council at its July 10, 2000 meeting and summarizes the Council staff's findings.

Please contact me if further information regarding this item is desired.

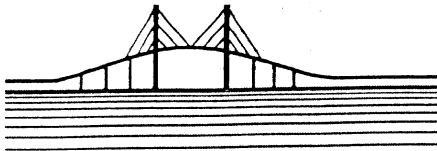
Sincerely,

Angela Hurley, Research Planner
Intergovernmental Coordination & Review

AH/bj

Enclosure

cc: Mr. Bill Fonferek, U. S. Army Corps of Engineers



IC&R

Intergovernmental Coordination and Review

9455 Koger Blvd., Suite 219, St. Petersburg, FL 33702
Phone (727) 570-5151 Suncom 513-5066 FAX (727) 570-5118
<http://www.tbrpc.org>

Tampa Bay Regional Planning Council

TAMPA HARBOR-ALAFIA RIVER FEASIBILITY STUDY AND DRAFT ENVIRONMENTAL ASSESSMENT, SAI #FL199802020037CR, HILLSBOROUGH COUNTY, IC&R #163-00.

The Florida State Clearinghouse has requested review and comment on the Feasibility Study and Draft Environmental Assessment for the Tampa Harbor - Alafia River project. The proposed project includes enlarging and deepening the turning basin and navigational channel which serves the Cargill facility at the mouth of the Alafia River in central Hillsborough County.

As studied, the proposed project encompasses:

- enlarging the turning basin from 700 X 1200 feet to 1200 feet in diameter;
- deepening the turning basin from 32 feet to 42 feet;
- widening the 3.6-mile access channel from 200 feet to 250 feet; and
- deepening the access channel from 32 feet to 42 feet.

An estimated 5.5 million cubic yards of sandy and rocky material would be removed. Proposed disposal sites include marsh and upland creation adjacent to Disposal Site 2-D and adjacent to Bird Island, shoreline protection for Bird Island; placement in existing disposal sites within Hillsborough Bay and the uplands; and placement at the Offshore Dredged Material Disposal Site.

The proposal would result in the loss of about 0.3 acres of mangroves and an unspecified amount of shallow water and shoreline habitat. Standard State and Federal manatee protection measures and federal Migratory Bird Protection Policy will be implemented during construction to eliminate impacts to manatees and nesting birds.

The project would allow Cargill Fertilizer, Inc. to bring in "PanaMax" vessels, the largest ships that can traverse the Panama Canal, to ship phosphate products to the Far East. Also, until the channel and turning basin are deepened, ships currently serving the facility cannot be loaded to full capacity at the dock. The improvements will result in more economical transport and help keep the company competitive with other manufacturers.

Council Comments/Concerns

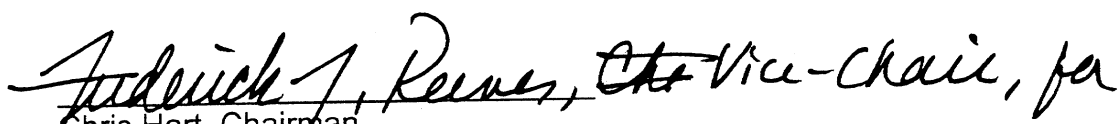
The project, including both the dredging and the planned dredged material disposal, will impact "Natural Resources of Regional Significance" in *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region* (FRSRPP). Impacts could occur to designated wetlands, Priority Wetlands for Species (7+), and Rare/Endangered Species Occurrences. Pursuant to FRSRPP Policies 4.5.1, 4.5.2, and 4.5.6, it must be determined that the proposed impacts are of over-riding public interest. Mitigation ratios at a minimum of 4 created:1 impacted or 8 restored:1 impacted are recommended for impacts to such resources.

The Council's Agency on Bay Management has also reviewed the project and its comments are attached to this report.

Concerns are that the proposed additional filling of Hillsborough Bay (159 acres) will further exacerbate the poor circulation and flushing of the Bay; and that impacts to the southern shoreline and shallow waters of the Alafia River are avoidable. Alternative disposal sites, including the western shore of Egmont Key, uplands, and other opportunities for beneficial use should be further investigated.

Further, it is recommended that any additional comments addressing local concerns be considered prior to final action.

Council adopted July 10, 2000


Chris Hart, Chairman
Tampa Bay Regional Planning Council

This project has been reviewed for consistency with the Council's adopted growth policy, *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region*. Until the aforementioned concerns are reconciled, this proposal is not consistent with Council policies.

PLEASE NOTE: The Committee's comments constitute compliance with Florida's Intergovernmental Coordination and Review process only.

Pertinent Council policies are:

4.1.6: Prohibit new dredging, channelization or other alterations which result in water quality degradation in or adjacent to regionally-significant natural systems such as intertidal, estuarine, riverine or special habitats. This provision is not intended to prohibit channel improvements at Port Manatee, Port of Tampa or the Port of St. Petersburg; but such improvements need to be sensitive to regionally-significant natural resources.

4.5.1: Protect, preserve and restore all regionally-significant natural resources shown on the Map of Regionally-Significant Natural Resources.

4.5.2: Impacts to regionally-significant natural resources shall be allowed only in cases of overriding public interest and when it is demonstrated and/or documented that the mitigation will successfully recreate the specific resource. Mitigation should meet the following minimum ratios:

- Intertidal habitats 3:1
- Coastal strand and barrier islands 3:1
- Open water marine and estuarine habitats 4:1

•	Beaches	2:1
•	Riverine habitats	3:1
•	Lake habitats	3:1
•	Special habitats	2:1

4.5.6: Mitigation by restoring disturbed habitat of a similar nature, including the removal of exotic plant species, may be acceptable. The minimum acceptable ratio shall be twice the habitat re-creation ratio set forth in policy 4.5.2.

4.5.14: Prohibit channelization through regionally-significant natural systems such as intertidal, estuarine, riverine and special habitats; solely to create new lands for development; or to create new navigation access.

4.6.5: Discourage projects which could alter natural tidal circulation. Necessary projects which would alter circulation shall minimize impact to tidal circulation and flushing and mitigate unavoidable impacts.

4.7.1: Prevent the dredging or filling of submerged lands not previously subject to dredging or filling, except in cases of overriding public interest that protect regionally-significant natural resources.

4.7.2: Uncontaminated dredged material shall be considered a resource to be utilized for appropriate beneficial uses such as recreation and wildlife habitat. Require revegetation plans for spoil areas utilizing appropriate native plant species.

4.7.4: Encourage the development and use of innovative and efficient dredged material disposal methods which reduce adverse environmental impacts and financial costs of dredged material disposal.

4.7.6: Regionally-significant natural resources shall be protected from adverse effects of dredge and fill activities.

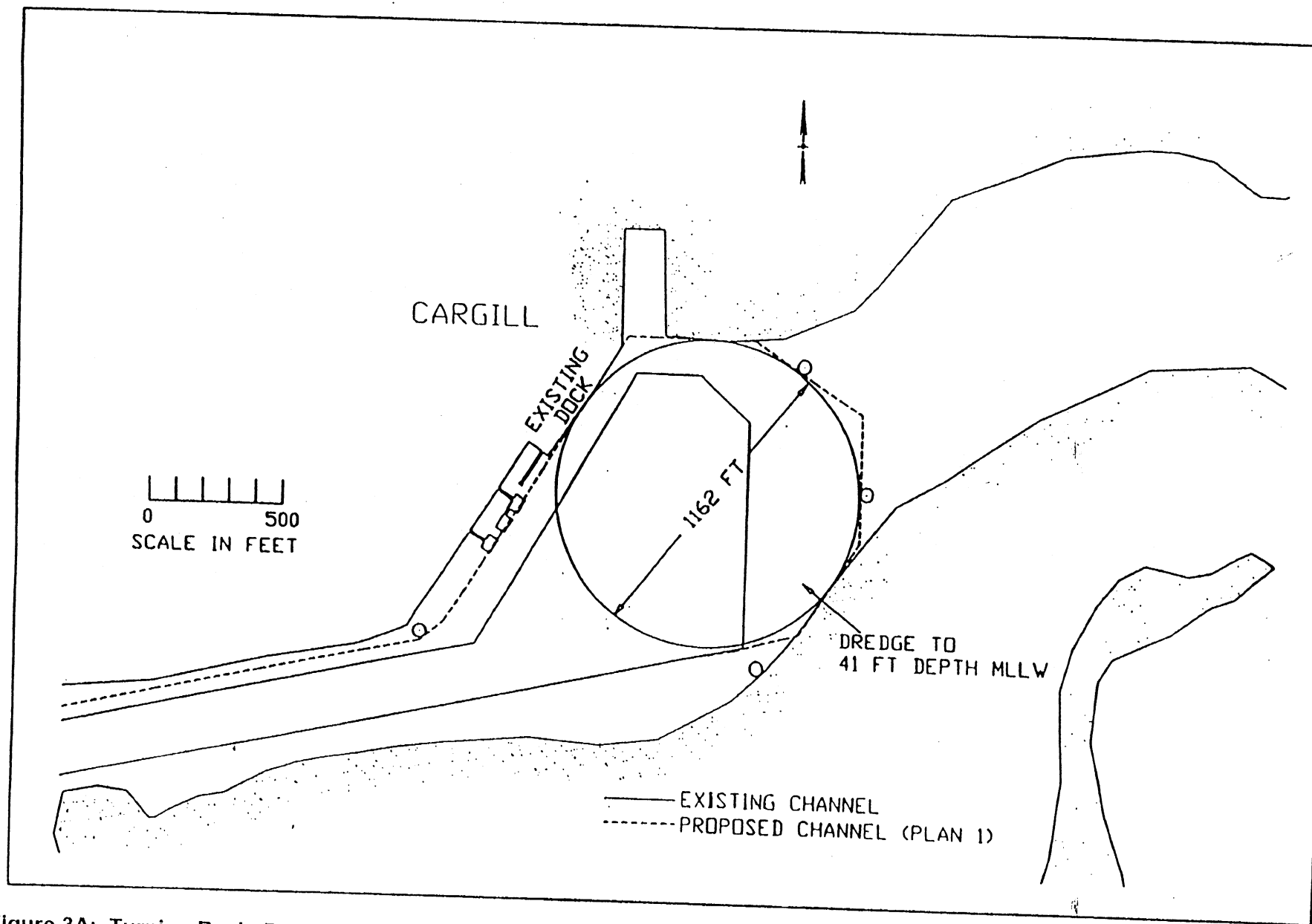


Figure 3A: Turning Basin Detail

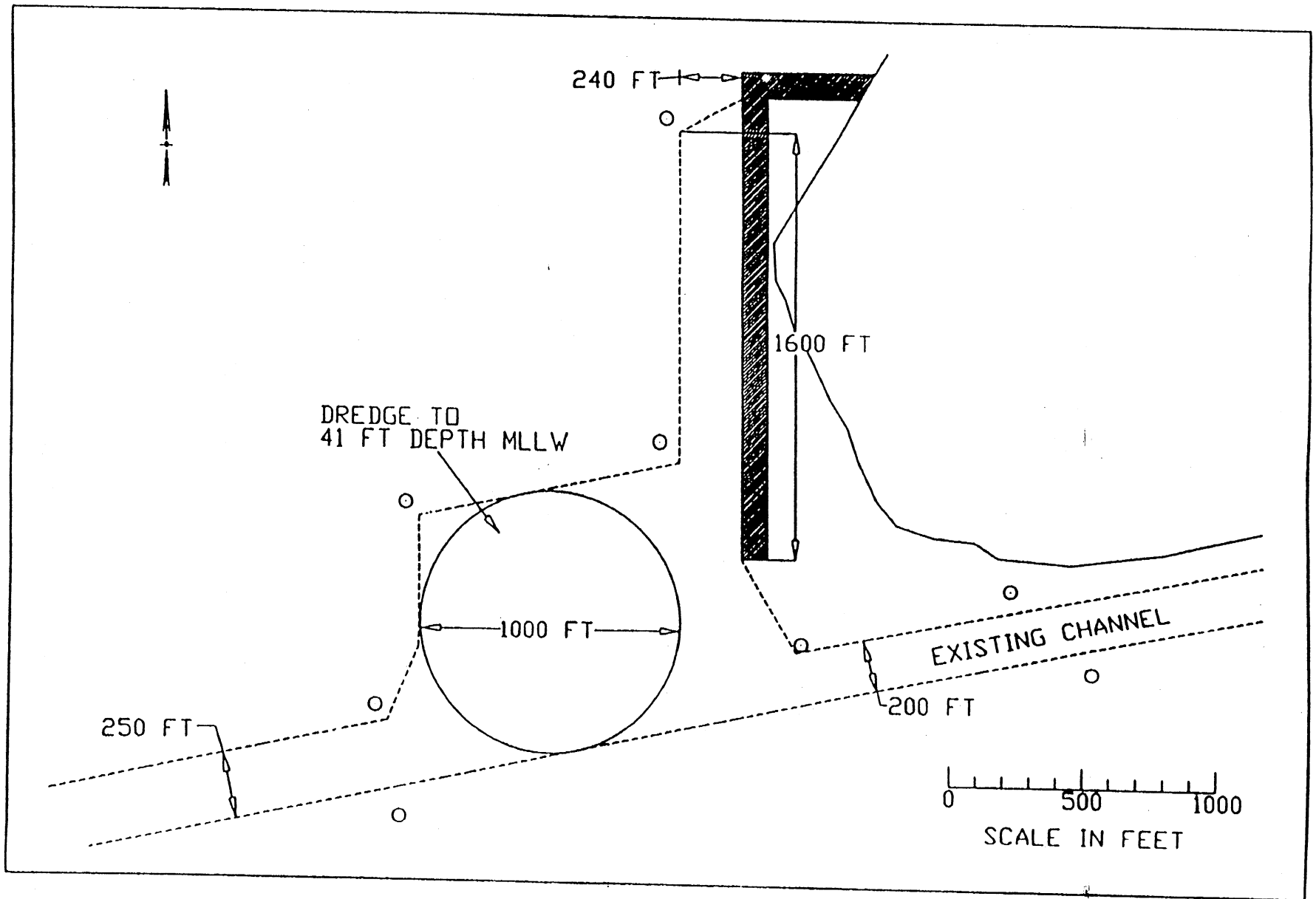
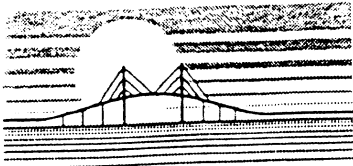


Figure 4A: Turning Basin Detail



*Tampa Bay Regional Planning Council
Agency on Bay Management*

9455 Koger Blvd., Suite 219
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(727) 570-5151/ FAX (727) 570-5118
SunCom 513-5066

**An Alliance of Agencies,
Organizations and
Interest Groups for the
Management of Tampa Bay**

Tampa Bay Regional Planning Council
Florida Senate
Florida House of Representatives
Tampa Bay Estuary Program
FL Department of Environmental
Protection
FL Marine Research Institute
FL Department of Transportation
FL Fish and Wildlife Conservation
Commission
Southwest FL Water Management
District
Environ. Protection Comm. of
Hillsborough County
Hillsborough County Planning
Commission
IFAS / Florida SeaGrant
National Audubon Society
Manasota 88
League of Women Voters'
Environmental Coalition
Sierra Club
Tampa BayWatch
Center for Marine Conservation
Coastal Conservation Association of FL
Egmont Key Alliance
Tampa Bay Pilots
Commercial Fishermen
Recreational Interests
Tampa Bay Partnership
Contractors and Builders Association of
Pinellas County
National Marine Fisheries Service
U.S. Army Corps of Engineers
U.S. Coast Guard -
Marine Safety Office
U.S. Fish and Wildlife Service
U.S. Geological Survey
MacDill Air Force Base
Post, Buckley
Cargill Fertilizer, Inc.
IMC-Agrico Fertilizer
Florida Petroleum Council
Florida Power Corporation
Tampa Electric Company
Florida Power & Light Company
Manatee County Port Authority
Port of St. Petersburg
Tampa Port Authority
Hillsborough County
Manatee County
Pasco County
Pinellas County
City of Clearwater
City of St. Petersburg
City of Tampa
Eckerd College
Hillsborough Community College
USF Marine Science/
Tampa Bay PORTS

June 14, 2000

Commissioner Chris Hart, Chairman
Tampa Bay Regional Planning Council
9455 Koger Boulevard
St. Petersburg, FL 33702

Dear Chairman Hart:

RE: Tampa Harbor-Alafia River, Feasibility Report with Draft
Environmental Assessment

At its meeting on June 8, 2000, the Natural Resources/Environmental Impact Review Committee of the Agency on Bay Management received a presentation on the above-referenced project from the US Army Corps of Engineers and discussed the plan at length. It voted unanimously to adopt these positions and recommendations and to forward them to the appropriate entities.

The proposed project includes enlarging and deepening the turning basin and navigational channel which serves the Cargill facility at the mouth of the Alafia River in central Hillsborough County. Wetland and shallow water habitat would be impacted and approximately 5.5 million cubic yards of dredged material would be generated.

It was recognized that a substantial effort has been made to design a project which would result in reduced environmental impacts. Concerns were raised regarding construction of a federal project to serve a single user, some of the proposed methods of spoil disposal, the amount of filling that has already occurred in Hillsborough Bay, and avoidable impacts to the shoreline of the Alafia River.

The Agency on Bay Management's Natural Resources/Environmental Impact Review Committee position on the proposed project is:

1. The US Army Corps of Engineers should keep its policy of not funding projects which benefit a single user;
2. Any Bay bottom involved in the project not already owned by the Tampa Port Authority should be deeded to the Authority;
3. There should be no filling in Hillsborough Bay to create new uplands from Bay bottom; and

4. The proposed footprint of the turning basin should be shifted to the north and east, so as not to impact the south shore of the Alafia River.

It is also recommended that any dredged material which is suitable for the purpose be used to help stabilize the shoreline of Egmont Key.

Thank you for considering these comments in the Tampa Bay Regional Planning Council's review of the project for the State Clearinghouse.

Sincerely,



George Henderson
Co-Chair, Natural Resources/Environmental
Impact Review Committee

cc: Mr. William Fonferek
Mr. Gray Gordon
Mr. Dave Parsche
Ms. Barbara Romano

Hillsborough County
City-County
Planning
Commission

THE PLANNING COMMISSION

Ronald A. Govin
Chairman

June 12, 2000

Jacqueline R. Wilson
Vice-Chairman

Ms. Kristi Thum
Tampa Bay Regional Planning Council
9455 Koger Blvd. Suite 219
St. Petersburg, FL 33702-2491

Christine Malzone
Member-at-Large

James N. Beeler, Jr.
Dottie Berger

Terri G. Cobb
Bruce P. Cury

Barbara H. Dowling
J.E. (Dooley) Houghtaling
Vivian N. Kitchen

RE: Draft Feasibility Report and Draft Environmental Assessment -
Navigational Study for Tampa Harbor - Alafia River -
SAI# FL199802020037CR

Robert B. Hunter, AICP
Executive Director

Dear Ms. Thum:

The Planning Commission has completed its review of the Florida State Clearinghouse Local Government Coordination Routing Slip for the Draft Feasibility Report and Draft Environmental Assessment of the Navigational Study for Tampa Harbor on the Alafia River (SAI# FL199802020037CR).

The Planning Commission would like to express the following concerns regarding the proposed project:

1. Based on the information provided, the benefits of this project would primarily accrue to a single user. Only one private corporation has facilities which could be expected to benefit from this project. As such, Federal funding of this project would be inconsistent with the "single owner policy."
2. Additional clarification is recommended regarding the Cost/benefit analysis. It appears to suggest that benefits would accrue as a result of the project in terms of the transport of phosphate products, sulfur and ammonia. However, our information suggests that sulfur and ammonia are commonly transported in vessels smaller than the Panamax class, for which this project is designed to serve. Moreover, we know of no plans to bring ammonia into this area and only limited amounts of sulfur could be expected due to the development of an alternative sulfur facility located at another site.
3. Opportunities for moving the turning basin to the north should be further investigated in order to avoid impacts to mangrove wetlands and shallow bottom communities.

601 E. Kennedy, 18th Floor
P.O. Box 1110
Tampa, Florida 33601-1110
813/272-5940
FAX 813/272-6258
FAX 813/272-6255
Internet E-Mail:
plancom@plancom.org
Home Page:
<http://www.plancom.org>



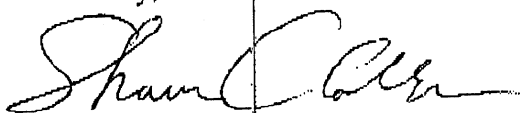
recycled paper

A Consolidated City-County Agency serving the cities of Tampa, Plant City, Temple Terrace and the County of Hillsborough
An Affirmative Action-Equal Opportunity Employer

4. Documentation suggests that the sediments in the project area contain elevated levels of cadmium, chromium, lead, mercury, zinc, and PCB's. We would recommend a more thorough analysis as to the risk of exposing these contaminants to the water column and the risks of the proposed beneficial use of this dredge material.
5. Water quality in the project area has been documented as poor, especially in regard to dissolved oxygen levels. Additional analysis is recommended to determine the proposed project's potential long term impact on water quality, especially in regard to dissolved oxygen levels, water circulation and flushing.
6. Rip-rap and revetments are proposed to stabilize the newly created mangrove fringe shoreline along the southern shore of the turning basin. Additional information and analysis is recommended to evaluate the design and engineering of this new shoreline in terms of its hydro-biologic benefit and value relative to natural, unhardened mangrove fringe shoreline.
7. The Project will result in the loss of 34 acres of shallow water, benthic habitat. Proposed beneficial use projects are suggested to have the potential to mitigate for this loss. However, hydro-dynamic modeling indicates that proposed beneficial use project sites experience heavy erosion. Furthermore, the location of the proposed beneficial use projects exhibit current environmental benefits which could be impacted by the deposition of dredge material. We recommend that a careful analysis be conducted of the proposed beneficial use sites, including the potential for erosion of contaminant laden dredge material and loss of existing productive habitat.

Thank you for the opportunity to participate in this process. Should you have any questions please contact us at (813) 272-5940.

Sincerely,



Shawn C. College, AICP
Senior Planner

CC: Al Eisenmenger, Executive Planner
James Duck, ACOE